

MUNGER, TOLLES & OLSON LLP
GLENN POMERANTZ (SBN 112503)
TAMERLIN GODLEY (SBN 194507)
MELINDA E. LEMOINE (SBN 235670)
SARALA V. NAGALA (SBN 258712)
Glenn.Pomerantz@mto.com
Tamerlin.Godley@mto.com
Melinda.LeMoine@mto.com
Sarala.Nagala@mto.com
355 South Grand Avenue
Thirty-Fifth Floor
Los Angeles, CA 90071-1560
Telephone: (213) 683-9100
Facsimile: (213) 687-3702

Attorneys for Defendant
WARNER MUSIC GROUP CORP.

Additional Counsel Listed on Signature Pages

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

DEBRA SLEDGE, JOAN SLEDGE,
KATHY SLEDGE LIGHTFOOT, KIM
SLEDGE ALLEN, jointly d/b/a "SISTER
SLEDGE," and RONEE BLAKLEY, on
behalf of themselves and all others
similarly situated,

Plaintiffs,

v.

WARNER MUSIC GROUP CORP.,

Defendant.

CASE NO. 12-CV-0559-RS

RELATED CASES:

CASE NO. 12-CV-0870-RS

CASE NO. 12-CV-1531-RS

CASE NO. 12-CV-1611-RS

CASE NO. 12-CV-1790-RS

**STIPULATION AND ~~PROPOSED~~
ORDER EXTENDING DEADLINE TO
EXCHANGE INITIAL DISCLOSURES**

Judge: Hon. Richard Seeborg

1 Plaintiffs in the following related cases: *Sledge, et al. v. Warner Music Group Corp.*, No.
 2 C 12-0559; *Wright v. Warner Music Group Corp.*, No. C 12-00870; *Castillo, et al. v. Warner*
 3 *Music Group Corp.*, No. C 12-01531; *Johnston, et al. v. Warner Music Group Corp.*, No. C 12-
 4 01611; and *Risko v. Warner Music Group Corp.*, No. C 12-01790 (collectively “Plaintiffs”) and
 5 Defendant Warner Music Group Corp. (“Defendant” or “WMG”) hereby stipulate by and through
 6 their counsel of record:

7 WHEREAS, the parties held a conference pursuant to Federal Rule of Civil Procedure
 8 26(f) on May 1, 2012;

9 WHEREAS, this Court scheduled an initial case management conference in the above-
 10 captioned actions on May 24, 2012;

11 WHEREAS, pursuant to this Court’s Order Setting Initial Case Management Conference
 12 and ADR Deadlines in the *Sledge* Action, the deadline for the parties to exchange initial
 13 disclosures in all of the above-captioned actions is seven days prior to the initial case
 14 management conference, or May 17, 2012;

15 WHEREAS, this Court will hear a motion regarding appointment of interim lead counsel
 16 for Plaintiffs and a motion to consolidate the above-captioned actions on May 24, 2012;

17 WHEREAS, Plaintiffs have indicated that they intend to file a consolidated amended
 18 complaint, pending resolution of the motion to consolidate and the interim lead counsel motion;

19 WHEREAS, the parties agree that in the interests of efficiency, initial disclosures should
 20 not be exchanged until after the Plaintiffs’ leadership issues are resolved an a consolidated
 21 amended complaint setting forth the operative allegations in the matter is filed;

22 WHEREAS, pursuant to Local Civil Rule 6-1(b), a Court order is necessary to alter the
 23 deadline for the exchange of initial disclosures because it was fixed by Court order;

24 IT IS HEREBY STIPULATED THAT:

25 Upon this Court’s order, the deadline for the parties to exchange initial disclosures shall
 26 be extended to fourteen days after the filing of any consolidated amended complaint.

1 Dated: May 16, 2012

Respectfully Submitted,

3 /s/ Daniel L. Warshaw

4 Daniel L. Warshaw

PEARSON, SIMON, WARSHAW & PENNY LLP

5 *Attorneys for the Sledge and Wright Plaintiffs and the*
6 *Class**

8 Dated: May 16, 2012

Respectfully Submitted,

10 /s/ William M. Audet

11 William M. Audet

AUDET & PARTNERS, LLP

12 *Attorneys for the Castillo Plaintiffs and the Class**

14 Dated: May 16, 2012

Respectfully Submitted,

16 /s/ Michael W. Sobol

17 Michael W. Sobol

LIEFF, CABRASER, HEIMANN & BERSTEIN,
18 LLP

19 *Attorneys for the Johnston Plaintiffs and the Class**

20 Dated: May 16, 2012

Respectfully Submitted,

22 /s/ Bryan L. Clobes

23 Bryan L. Clobes

CAFFERTY FAUCHER LLP

24 *Attorneys for the Risko Plaintiffs and the Class**

1 Dated: May 16, 2012

Respectfully Submitted,

3 /s/ Tamerlin J. Godley

4 Tamerlin J. Godley
5 MUNGER, TOLLES & OLSON LLP

6 *Attorneys for Defendant Warner Music Group*
7 *Corp.**

8
9 * A complete list of the attorneys for each party can be seen on each case's docket.

10 Filer's Attestation

11 I, Tamerlin J. Godley, am the ECF user whose identification and password are being used
12 to file this STIPULATION EXTENDING DEADLINE TO EXCHANGE INITIAL
13 DISCLOSURES. In compliance with General Order 45.X.B, I hereby attest that the counsel
14 listed above concur in this filing.

15
16 DATED: May 16, 2012

17 /s/ Tamerlin J. Godley
TAMERLIN J. GODLEY

**DECLARATION OF TAMERLIN J. GODLEY IN SUPPORT OF STIPULATION
EXTENDING DEADLINE TO EXCHANGE INITIAL DISCLOSURES**

I, Tamerlin J. Godley, hereby declare:

1. I am a partner with the firm of Munger, Tolles & Olson LLP, counsel for Defendant Warner Music Group Corp. ("WMG") in the above-captioned actions.

2. I make this declaration pursuant to Local Civil Rule 6-2(a), in support of the parties' stipulated request to extend the deadline to exchange initial disclosures.

3. The parties held a conference pursuant to Federal Rule of Civil Procedure 26(f) on May 1, 2012. The current deadline to exchange initial disclosures in the above-captioned actions is May 17, 2012. Pending the Court's resolution of the motion to appoint interim lead counsel and the motion to consolidate the above-captioned actions, which will both be heard on May 24, 2012, Plaintiffs have indicated that they intend to file a consolidated amended complaint. In the interest of efficiency and in light of the leadership issues to be resolved for Plaintiffs, the parties have agreed to defer the deadline for exchanging initial disclosures until fourteen days after the filing of any consolidated amended complaint.

4. The only previous time modifications in the above-captioned cases were stipulations to extend WMG's time to respond to the complaint in the *Sledge* and *Castillo* actions.

5. The requested time modification would likely have no impact on the schedule for the above-captioned cases.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed this 16th day of May, 2012, at Los Angeles, California.

/s/ Tamerlin J. Godley
Tamerlin J. Godley

[PROPOSED] ORDER

Pursuant to the parties' stipulation, the deadline for the parties in *Sledge, et al. v. Warner Music Group Corp.*, No. C 12-0559; *Wright v. Warner Music Group Corp.*, No. C 12-00870; *Castillo, et al. v. Warner Music Group Corp.*, No. C 12-01531; *Johnston, et al. v. Warner Music Group Corp.*, No. C 12-01611; and *Risko v. Warner Music Group Corp.*, No. C 12-01790 to exchange initial disclosures shall be and hereby is extended to fourteen days after Plaintiffs in these actions file a consolidated amended complaint.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 5/17, 2012



The Honorable Richard Seeborg
United States District Judge